

SAN DIEGO, CA

AVALON, CA

Ramona V. Ladwig Hyde & Swigart 1910 Pacific Avenue

RIVERSIDE, CA

PHOENIX, AZ

Suite 14155 Dallas, Texas

DENVER, CO

T: 214.880.6362

LANSING, MI

F: 800.635.6425

MINNEAPOLIS, MN

www.westcoastlitigation.com

Las Vegas, NV

ramona@westcoastlitigation.com

DALLAS, TX SEATTLE, WA

Licensed in NY, FL, and TX

February 27, 2018

BY ECF

Hon. Gabriel W. Gorenstein United States Magistrate Judge Chief U.S. Magistrate Judge Daniel Patrick Moynihan 500 Pearl Street New York, NY 10007-1312

Re: Sasso v. JP Morgan Chase Bank, No. 17-cv-7722 (S.D.N.Y.)

Dear Judge Gorenstein:

The Court requested the parties meet and confer and submit a letter on the approximate date and month the parties desire to schedule a settlement conference. The parties are unable to agree on a date. Plaintiff respectfully submits this letter setting forth the reasons for this.

The parties arranged a conference to discuss scheduling a time for settlement on Friday, February 23, 2018. Prior to the conference, Defendant Chase Bank specifically requested Plaintiff be prepared to discuss two items: (1) how Plaintiff intended to proceed with this matter in light of informal discovery, and (2) any settlement demand Plaintiff may make. Undersigned communicated to Chase that we would like to proceed with discovery to obtain the complete file, specifically including all communications between Chase and Equifax on the subject account. Undersigned also communicated the settlement demand to Chase that was requested by Chase. No response was and has been forthcoming.

Subsequent to the discussions on Friday, Plaintiff emailed Monday, February 26, requesting a response to the items discussed. Undersigned inquired as to whether Chase would be responding to the offer. Chase did not respond. Undersigned inquired as to whether Chase would be responding to the request for an approximate date and time to schedule a settlement conference. Chase did not respond.

Undersigned emailed again this morning. Chase responded that "given [the] settlement demand, [they] do not think a settlement conference before the magistrate would be productive at this time."

As such, unfortunately, Plaintiff is unable to provide the Court the requested information. Should Chase at any time respond, Plaintiff will immediately inform the Court.

Respectfully submitted,

/s/ Ramona Ladwig

Ramona Ladwig
Hydge &Swigart
1910 Pacific Avenue, Suite 14155
Dallas, Texas 75024
T: (214) 880-6362
F:
ramona@westcostlitigation.com

/s/ Abbas Kazerounian

Abbas Kazerounian Kazerounian Law Group 245 Fischer Avenue, Unit D1 Costa Mesa, CA 92626 T: (800) 520-5523 F: (800) 520-5523 ak@kazlg.com

Counsel for Plaintiff